

ELLIOTT & ELLIOTT, P.A.  
ATTORNEYS AT LAW  
1508 Lady Street  
COLUMBIA, SOUTH CAROLINA 29201  
[selliot@elliottlaw.us](mailto:selliot@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
FACSIMILE (803) 771-8010

March 28, 2013

**VIA E-FILING**

Jocelyn D. Boyd  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211

RE: Application of Duke Energy Carolinas, LLC for Authority to Adjust and  
Increase Its Electric Rates and Charges  
Docket No. 2013-59-E

Dear Ms. Boyd:

Enclosed please find for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

If you have questions, please do not hesitate to contact me.

Sincerely yours,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/mjl  
Enclosures

cc: All parties of record (w/enc.)

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2013-59-E**

IN THE MATTER OF:	)	
	)	
Application of Duke Energy Carolinas,	)	<b>PETITION TO INTERVENE</b>
LLC for Authority to Adjust and Increase	)	
The Company's Electric Rates and Charges	)	

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:


1. That on March 18, 2013, Duke Energy Carolinas, LLC ("Duke") filed an Application with the Public Service Commission ("Commission") requesting authority to adjust and increase its retail electric rates, charges, and tariffs. The Application was filed pursuant to S.C. Code Ann. Section 58-27-820 and 58-27-870 (Supp. 2012) and 10 S.C. Code Ann. Regs. 103-303 and 103-823 (Supp. 2012).
2. That SCEUC is an association organized in the State of South Carolina, consisting of large consumers of energy which are engaged in various manufacturing enterprises throughout the State.
3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from Duke.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:



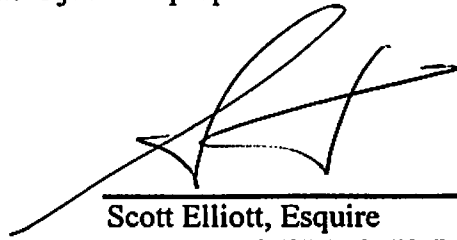
Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
1508 Lady Street  
Columbia, South Carolina 29201  
Telephone: 803-771-0555  
Fax: 803-771-8010

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.

P.3



---

Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
1508 Lady Street  
Columbia, SC 29201  
(803) 771-0555

Attorney for the South Carolina Energy  
Users Committee

Columbia, South Carolina  
March 28, 2013

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below via first class United States mail, postage prepaid, to the person(s) named below at the address set forth:

RE:                      Application of Duke Energy Carolinas, LLC for Authority to  
Adjust and Increase Its Electric Rates and Charges  
DOCKET NO.: 2013-59-E

### PARTIES SERVED:

Charles A. Castle, Esquire Associate General Counsel Duke Energy Corporation DEC45A/Post Office Box 1321 Charlotte, NC 28201 <a href="mailto:alex.castle@duke-energy.com">alex.castle@duke-energy.com</a>	Shannon B. Hudson, Esquire Courtney D. Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 <a href="mailto:shudson@regstaff.sc.gov">shudson@regstaff.sc.gov</a> ; <a href="mailto:cedwards@regstaff.sc.gov">cedwards@regstaff.sc.gov</a>
Frank R. Ellerbe, III, Esquire Bonnie D. Shealy, Esquire Robinson, McFadden & Moore, P.C. Post Office Box 944 Columbia, SC 29202 <a href="mailto:fellerbe@robinsonlaw.com">fellerbe@robinsonlaw.com</a> ; <a href="mailto:bshealy@robinsonlaw.com">bshealy@robinsonlaw.com</a>	Timeka Shafeek-Horton, Counsel Duke Energy Carolinas, LLC Post Office Box 1006/EC03T Charlotte, NC 28201 <a href="mailto:Timika.shafeek-horton@duke-energy.com">Timika.shafeek-horton@duke-energy.com</a>

PLEADING:                      PETITION TO INTERVENE – SOUTH CAROLINA  
ENERGY USERS COMMITTEE

March 28, 2013

  
\_\_\_\_\_  
MaryJo Lawracy, Legal Assistant